

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

(1) JERRY W. STAFFORD,

Plaintiff,

v.

Case No.: 22-cv-74-KEW

(1) DEPARTMENT OF THE ARMY,

(2) TEAMGOV, INC., AND

(3) TATITLEK FEDERAL SERVICES, INC.,

Defendants.

COMPLAINT

COMES NOW, the Plaintiff, Jerry W. Stafford, by and through his attorney of record, Edwards & Patterson, and for his cause of action against the Defendants, Department of the Army, TeamGov, Inc., and Tatitlek Federal Services, Inc., alleges and states as follows:

1. That the Plaintiff, Jerry W. Stafford, is a resident of McAlester, Pittsburg County, Oklahoma.

2. That the Defendant, Department of the Army, is a United States governmental agency, operating at McAlester Army Ammunition Plant in Pittsburg County, Oklahoma.

3. That the Defendant TeamGov, Inc., is a foreign for profit corporation based and incorporated in Washington, DC.

4. That the Defendant Tatitlek Federal Services, Inc., is a foreign for profit business corporation based in Alaska, and duly registered and doing business in the state of Oklahoma.

5. That the motor vehicle collision which gives rise to this action occurred on the property of the McAlester Army Ammunition Plant in McAlester, Pittsburg County, Oklahoma.

6. That this Court has jurisdiction and venue in this matter.

7. That the Plaintiff, Jerry W. Stafford, is without fault and that the damages from the collision were directly and proximately caused by and due to the negligence of the Defendants set forth below.

8. That on or about October 22, 2020, Plaintiff Jerry W. Stafford, was driving his vehicle in a safe and lawful manner, traveling on Rowe Road on the property of the McAlester Army Ammunition Plant where Plaintiff was a guest. Plaintiff Stafford was traveling in a convoy of trucks who were on the property for deer hunting. Plaintiff had a green light and continued following the convoy when the Rowe Road Barrier deployed as Plaintiff's front tires crossed over the barrier. The explosive-like deployment of the barrier caused his pickup to become airborne and land approximately thirty-one feet southwest of the barrier. The Rowe Road Barrier was under repair operations. The Defendant the Department of the Army, and/or Defendants TeamGov, Inc. and Tatitlek Federal Services, Inc., were negligent and careless in their operations of the Rowe Road Barrier. Plaintiff was unable to stop or avoid the barrier. As a result of the collision heretofore mentioned, Plaintiff Jerry W. Stafford suffered bodily injury.

9. That Defendants, the Department of the Army, TeamGov, Inc. and Tatitlek Federal Services, Inc., are vicariously liable for the above described actions and/or inactions of its repair operations of the Rowe Road Barrier.

10. That as a result of the negligence of the Defendant and the resulting collision heretofore mentioned, Plaintiff suffered bodily injury and damage to his personal property.

11. As a direct and proximate result of the negligence of the Defendants, the following damages were caused, for which damages are claimed by the Plaintiff in an

amount in excess of \$75,000.00; past, present and future physical pain and suffering; past, present and future medical expenses; lost earnings; impairment to earning capacity; and permanent injuries.

WHEREFORE, Plaintiff prays for a judgment against the Defendants in an amount in excess of \$75,000.00, his costs, and such other and further relief to which he may be entitled.

Respectfully submitted,

EDWARDS & PATTERSON LAW

/s/ Tony W. Edwards

Tony W. Edwards, OBA #2649

Matthew B. Patterson, OBA #22266

321 S. 3rd Street, Suite 1

McAlester, Oklahoma 74501

Telephone (918) 302-3700

Fax (918) 302-3701

Attorneys for Plaintiff

**JURY TRIAL DEMAND RESERVED
ATTORNEY LIEN CLAIMED**